

Chancery Court
Second Monday in May
Last Monday in November

Circuit Court
First Monday in January
Third Monday in June

MRS. ERLINE D. FORTNER
CLERK OF THE CHANCERY AND CIRCUIT COURTS
ISSAQUENA COUNTY
P.O. BOX 27
MAYERSVILLE, MISSISSIPPI 39113
TELEPHONE (662) 873-2761
FAX (662) 873-2061

STATE OF MISSISSIPPI

COUNTY OF ISSAQUENA

I, ERLINE D. FORTNER, CIRCUIT CLERK IN AND FOR THE COUNTY AND
STATE AFORESAID, DO HEREBY CERTIFY THAT THE ATTACHED TWENTY-NINE PAGES
ARE TRUE AND COPIES OF ISSAQUENA CIRCUIT COURT CAUSE NO. 2014-01 FILED
ON MARCH 26, 2014 IN SAID CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI.

GIVEN UNDER MY HAND AND OFFICIAL SEAL this 1st day of APRIL,
2014.




ERLINE D. FORTNER, CIRCUIT CLERK

CAUSE NO. 2014-01
CIRCUIT COURT ISSAQUENA COUNTY, MS
29 PAGES (Twenty-Nine)

COVER SHEET
Civil Case Filing Form
*(To be completed by Attorney/Party
Prior to Filing of Pleading)*

Mississippi Supreme Court
Administrative Office of Courts

Form AOC/01
(Revised 1/1/2001)

Court Identification
Docket Number
28907
County # Judicial District Court ID
032614
Month Date Year

Case Year
2014

Docket Number
01
Local Docket ID

This area to be completed by clerk

Case Number if filed prior to 1/1/94

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY
Short Style of Case: Angel Jordan et al v. Issaquena County, Mississippi et al
Party Filing Initial Pleading: Type/Print Name David M. Sessums MS Bar No. 6714
Check (✓) if Not an Attorney Check (✓) if Pro Hac Vice Signature David M. Sessums
Compensatory Damages Sought: \$ _____ Punitive Damages Sought: \$ _____
Is Child Support contemplated as an issue in this suit? Yes ☒ No ☐ If "yes" is checked, please submit a completed Child Support Information Sheet with Final Decree/Judgment

PLAINTIFF - PARTY(IES) INITIALLY BRINGING SUIT SHOULD BE ENTERED FIRST (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL PLAINTIFFS ON SEPARATE FORM

Individual Jordan Last Name Angela First Name _____ (Maiden Name, if Applicable) Middle Init. _____ Jr/Sr/III/IV _____
Address of Plaintiff Vicksburg, MS
Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____
Estate of _____
Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____
D/B/A / Agency _____
Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated
Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: _____
D/B/A: _____

DEFENDANT - NAME OF DEFENDANT (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL DEFENDANTS ON SEPARATE FORM

Individual _____ Last Name _____ First Name _____ (Maiden Name, if Applicable) Middle Init. _____ Jr/Sr/III/IV _____
Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____
Estate of _____
Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____
D/B/A / Agency _____
Business Issaquena County, Mississippi
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated
Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below: _____
D/B/A: _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar No. _____ or Name: _____ Pro Hac Vice (✓) _____
(If known)

In left hand column, check one (1) box that best describes the nature of this suit. In right hand column check all boxes which indicate secondary claims.

Business/Commercial

☐ Accounting (Business)
☐ Bankruptcy
☐ Business Dissolution - Corporation
☐ Business Dissolution - Partnership
☐ Debt Collection
☐ Employment
☐ Examination of Debtor
☐ Execution
☐ Foreign Judgment
☐ Garnishment
☐ Pension
☐ Receivership
☐ Replevin
☐ Stockholder Suit
☐ Other _____

Domestic Relations

☐ Child Custody/Visitation
☐ Child Support
☐ Contempt
☐ Divorce: Fault
☐ Divorce: Irreconcilable Differences
☐ Domestic Abuse
☐ Emancipation
☐ Modification
☐ Paternity
☐ Property Division
☐ Separate Maintenance
☐ Termination of Parental Rights
☐ UIFSA (formerly URESA)
☐ Other _____

Contract

☐ Breach of Contract
☐ Installment Contract
☐ Insurance
☐ Product Liability under Contract
☐ Specific Performance
☐ Other _____

Probate

☐ Accounting (Probate)
☐ Birth Certificate Correction
☐ Commitment
☐ Conservatorship
☐ Guardianship
☐ Heirship
☐ Intestate Estate
☐ Minor's Settlement
☐ Muniment of Title
☐ Name Change
☐ Power of Attorney
☐ Testate Estate
☐ Will Contest
☐ Other _____

Statutes/Rules

☐ Bond Validation
☐ Civil Forfeiture
☐ Declaratory Judgment
☐ ERISA
☐ Eminent Domain
☐ Extraordinary Writ
☐ Federal Statutes
☐ Injunction or Restraining Order
☐ Municipal Annexation
☐ Racketeering (RICO)
☐ Railroad
☐ Seaman
☐ Other _____

Appeals

☐ Administrative Agency
☐ County Court
☐ Hardship Petition (Driver License)
☐ Justice Court
☐ MS Employment Security Comm'n
☐ Municipal Court
☐ Oil & Gas Board
☐ Workers' Compensation
☐ Other _____

Children and Minors - Non-Domestic

☐ Adoption - Noncontested
☐ Consent to Abortion for Minor
☐ Removal of Minority
☐ Other _____

Torts-Personal Injury

☐ Bad Faith
☐ Fraud
☐ Loss of Consortium
☐ Malpractice - Legal
☐ Malpractice - Medical
☒ Negligence - General
☒ Negligence - Motor Vehicle
☐ Products Liability
☐ Wrongful Death
☐ Other _____

Mass Tort

☐ Asbestos
☐ Chemical Spill
☐ Dioxin
☐ Hand/Arm Vibration
☐ Hearing Loss
☐ Radioactive Materials
☐ Other _____

Real Property

☐ Adverse Possession
☐ Ejectment
☐ Eminent Domain
☐ Judicial Foreclosure
☐ Lien Assertion
☐ Partition
☐ Receiver Appointment
☐ Tax Sale: Confirmation/Cancellation
☐ Title, Boundary &/or Easement
☐ Other _____

Civil Rights

☐ Elections
☐ Habeas Corpus
☐ Post Conviction Relief
☐ Prisoner
☐ Other _____

ATTEST
A TRUE COPY
4-1-2014

CLERK
ISSAQUENA COUNTY, MS

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI
JUDICIAL DISTRICT, CITY OF

Docket No. _____ - _____
File Yr Chronological No. Clerk's Local ID

Docket No. If Filed
 Prior to 1/1/94 _____

PLAINTIFFS IN REFERENCED CAUSE - Page 1 of ____ Plaintiffs Pages
 IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Plaintiff #2:

Individual: Jordan Hannah (Nicole)
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS PLAINTIFF: _____ Bar # or Name: _____ Pro Hac Vice (✓) ____ Not an Attorney(✓) ____

Plaintiff #3:

Individual: Jordan Michael (_____)
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS PLAINTIFF: _____ Bar # or Name: _____ Pro Hac Vice (✓) ____ Not an Attorney(✓) ____

Plaintiff #4:

Individual: _____ (_____)
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS PLAINTIFF: _____ Bar # or Name: _____ Pro Hac Vice (✓) ____ Not an Attorney(✓) ____

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI
JUDICIAL DISTRICT, CITY OF

Docket No: _____ - _____
File Yr Chronological No. Clerk's Local ID

Docket No. If Filed
 Prior to 1/1/94 _____

DEFENDANTS IN REFERENCED CAUSE - Page 1 of ____ Defendants Pages
IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Defendant #2:

Individual: _____
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business Issaquena County Regional Correctional Facility

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ____ Not an Attorney(✓) ____

Defendant #3:

Individual: _____
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ____ Not an Attorney(✓) ____

Defendant #4:

Individual: _____
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ____ Not an Attorney(✓) ____

VARNER PARKER & SESSUMS, P.A.
ATTORNEYS AT LAW
A PROFESSIONAL ASSOCIATION

J. MACK VARNER
DAVID M. SESSUMS
R. EUGENE PARKER, JR. - rep@vpslaw.com
CLIFFORD C. WHITNEY III - ccw@vpslaw.com
PENNY B. LAWSON - plawson@vpslaw.com

March 25, 2014

1110 JACKSON STREET
POST OFFICE BOX 1237
VICKSBURG, MS 39181

TELEPHONE (601) 638-8741
FACSIMILE (601) 638-8666
www.vpslaw.com

Ms. Earline Fortner
Issaquena County Circuit Clerk
129 Court Street
Mayersville, MS 39113

VIA Hand Delivery

RE: Angela Jordan et al v. Issaquena County, Mississippi et al
Issaquena County Circuit No.: 2014-01

Dear Ms. Fortner:

Enclosed with this letter please find the following:

1. Original and five (5) copies of Complaint;
2. Original and two (2) copies of Summons for service upon Issaquena County Regional Correctional Facility by service of process on Richard Jones, Sheriff of Issaquena County, Mississippi;
3. Original and two (2) copies of Summons for service upon Issaquena County Regional Correctional Facility by service of process on Earline Fortner, Chancery Clerk of Issaquena County, Mississippi;
4. Original and two (2) copies of Summons for service upon Issaquena County, Mississippi by service of process on Richard Jones, Sheriff of Issaquena County, Mississippi;
5. Original and two (2) copies of Summons for service upon Issaquena County, Mississippi by service of process on Earline Fortner, Chancery Clerk of Issaquena County, Mississippi;
6. Civil Cover Sheet;
7. Our firm check for initial filing fee.

Because of your dual capacity as both the Chancery Clerk and as the Circuit Clerk of Issaquena County, Mississippi I am requesting that you first file and issue each of the above referenced summons in your capacity as the Circuit Clerk of Issaquena County, Mississippi and then

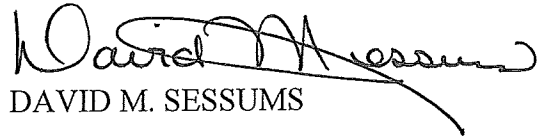
handing the executed summons over to Mr. Lance Tompkins, (who is delivering these documents to your offices as Circuit Clerk) and then allowing Mr. Tompkins to serve the summon and complaint on you in your capacity as Chancery Court Clerk of Issaquena County, Mississippi and allowing him to likewise deliver the summons down the hall to Sheriff Jones and then make his returns into your office as Circuit Clerk. (These emphasis are for the benefit of Mr. Tompkins).

Mr. Tompkins will have an additional firm check on him to make out an deliver to you should any additional fees be needed.

I appreciate your assistance, cooperation and understanding in this unique situation and should you have any question please do not hesitate to contact me.

With best regards, I am,

Very truly yours,


DAVID M. SESSUMS

DMS/ajn
Enclosures

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN

PLAINTIFFS

VS.

NO. 2014-01

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

DEFENDANTS

COMPLAINT

COMES NOW Angela Jordan and Hannah Nicole Jordan and Ann Michael Jordan by and through their Mother and next friend Angela Jordan, through counsel, and file this their Complaint against Issaquena County, Mississippi and Issaquena County Regional Correctional Facility showing unto the Court as follows:

PARTIES AND JURISDICTION

1. Prior to his death on April 7, 2013, Tony Jordan was a 46 year old adult resident citizen of Warren County, Mississippi. Angela Jordan is the surviving spouse of Tony Jordan and Hannah Nicole Jordan and Ann Michael Jordan are the surviving children of Tony Jordan and together they are all of the sole heirs-at-law and sole wrongful death beneficiaries of Tony Jordan.

2. Issaquena County Regional Correctional Facility is a county unit of Issaquena County, Mississippi organized and existing under the laws of the State of Mississippi which may be served by process on Richard Jones as Sheriff of Issaquena County, Mississippi and on Earline Fortner, Chancery Clerk of Issaquena County, Mississippi and Issaquena County, Mississippi is a subdivision of the State of Mississippi, upon which process may be had by service upon Earline Fortner, Chancery Clerk of Issaquena County, Mississippi, at her offices located in Mayersville,

ATTEST

A TRUE COPY

4-1-2014

Celine Fortner

CHANCERY CLERK

ISSAQUENA COUNTY, MS

FILED

March 26 2014

John Deane, Jr.

CLERK

Mississippi and on Richard Jones as Sheriff of Issaquena County, Mississippi.

3. Does 1- 10 are the unknown employees of Defendant, Issaquena County Regional Correctional Facility who denied Tony Jordan medical treatment.

4. This Court has jurisdiction of the subject matter hereof and venue is proper in Issaquena County, Mississippi.

FACTS

5. On March 28, 2013, Tony Jordan was taken into the custody of the Vicksburg, Mississippi Police Department.

6. On March 29, 2013, Tony Jordan was transferred by the Vicksburg Police Department to Issaquena County Regional Correction Facility (hereinafter "ICRCF") which is owned and operated by Issaquena County, Mississippi.

7. While incarcerated at ICRCF Tony Jordan suffered severe life threatening personal injury caused either by persons at the facility or by Tony Jordan himself.

8. After receiving severe, life threatening personal injury Tony Jordan required medical treatment but did not receive same.

9. Thereafter, Tony Jordan was transported by the Vicksburg Police Department to River Region Medical Center located in Vicksburg, Mississippi.

10. Thereafter, Tony Jordan was transported from the River Regional Medical Center in Vicksburg, Mississippi to University Medical Center located in Jackson, Mississippi.

11. On April 7, 2013, Tony Jordan died in University Medical Center from injuries received at ICRCF.

12. The injuries received by Tony Jordan in ICRCF were the proximate cause or a proximately contributing cause to the death of Tony Jordan on April 7, 2013.

13. Does 1 through 10 are employed by ICRCF. Plaintiffs reserve the right to name such employees upon ascertaining their identity.

COUNT ONE

14. Plaintiffs incorporate the allegations of all previous paragraphs.

15. Defendants had a common law duty to render necessary and required medical treatment to Tony Jordan while in their custody.

16. Defendants duty to render necessary and required medical treatment to Tony Jordan constituted a ministerial act and did not involve an element of choice and did not constitute a discretionary act or acts and involved no social, economical or political policy decisions.

17. Defendants wilfully and recklessly disregarded their duty and obligation to provide required and necessary medical treatment to Tony Jordan, or in the alternative, willfully and recklessly delayed providing necessary and required medical treatment to Tony Jordan.

18. Defendants' aforesaid act were in deliberate disregard of the safety and well being of Tony Jordan.

19. The aforesaid acts of Defendants indicated and constitute a deliberate indifference to protect Tony Jordan and/or to provide adequate medical treatment to Tony Jordan.

20. The aforesaid acts of Defendants agents and employees, Does 1 -10, are outside their usual course and scope of their employment for which Defendant and Defendant's employees are liable.

21. The aforesaid acts of Defendants were the proximate cause or proximate contributing cause of the death of Tony Jordan of which the Defendants are liable to the wrongful death beneficiaries of Tony Jordan.

COUNT TWO
BREACH OF STATUTE

22. Plaintiffs incorporate all of the allegations of the preceding paragraphs.

23. Section 47-1-27 (Miss. Code Ann. 1972) provides that any person having custody of any county prisoner, such as Tony Jordan, who shall wilfully fail to furnish medical attention to a person such as Tony Jordan shall be deemed guilty of a misdemeanor and on conviction fined in a sum of not more than \$500.00 and shall be imprisoned for not less than one (1) month or shall suffer both such fine and imprisonment.

24. Section 47-1-57 Miss. Code Ann. (1972) provides that when any person such as Tony Jordan shall be confined to jail and in need of medical or surgical aid that such aid shall forthwith be provided.

25. Section 47-1-59 Miss. Code Ann. (1972) provides that when any inmate such as Tony Jordan requires medical treatment or hospitalization that such medical treatment or hospitalization shall be forthwith provided.

26. That Defendants breached each of their duties under the aforesaid statutes.

27. The provisions of the aforesaid statutes and the requirements thereof are not discretionary, but are mandatory and ministerial.

28. Where there is no statute covering the common law prevails but where a specific statute exists such statute, such as the above referenced statutes, takes precedence over common law.

29. The aforesaid actions of Defendants constitute a wilful and reckless disregard of the known rights of Tony Jordan, constituted a deliberate disregard for the safety and well being of Tony Jordan, constituted deliberate indifference to Defendants' obligation to protect Tony Jordan and/or to provide and/or not delay adequate medical treatment to Tony Jordan.

30. That the aforesaid breaches of statute were the proximate or proximate contributing cause to the death of Tony Jordan.

31. That the requirements of said statutes are ministerial, did not involve choice, and do not involve any discretionary acts on the part of Defendants and do not involve any social, economical or political policy decisions.

32. Tony Jordan was within the class of persons designed to be protected by the aforesaid statutes.

33. Tony Jordan suffered severe personal injury and death as a result of Defendants' breach of the aforesaid statutes and, further Plaintiffs have been caused to suffer loss, injury and damages as a result of the aforesaid breaches by the Defendants.

COUNT THREE

34. Plaintiffs adopt the allegations of all preceding paragraphs.

35. That the aforesaid actions and omissions of Defendants constituted violation of the rights of Tony Jordan under the Eighth Amendment of the United States Constitution.

36. That the aforesaid actions and omissions of Defendants amounted to deliberate indifference to the need of Tony Jordan to adequate medical care and treatment and the aforesaid actions of Defendants are evidence of a deliberate indifference to the serious medical needs of Tony Jordan in violation of Tony Jordan's right under the Eighth Amendment to the United States Constitution.

37. That the aforesaid deprivation of constitutional rights of Tony Jordan were the proximate cause or proximate contributing cause of the injuries and subsequent death of Tony Jordan and to the damages sustained by Tony Jordan and to the damages sustained by Plaintiffs herein.

DAMAGES

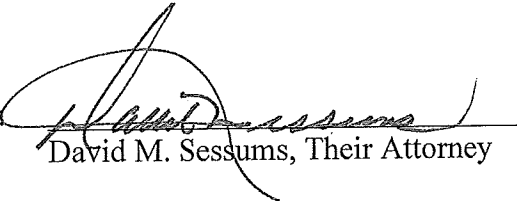
38. That Plaintiffs have suffered damages as a direct and proximate result of Defendants aforesaid acts and omissions including, but not limited to, personal injuries to Tony Jordan, and Plaintiff's loss of the love, companionship, affection and support of Tony Jordan.

WHEREFORE PREMISES CONSIDERED, Plaintiffs demand judgment of and from Defendants in such sum as may be determined by the trier of fact, together with their reasonable attorneys fees with all costs herein assessed unto Defendants.

Respectfully submitted,

ANGELA JORDAN, ET AL

BY



David M. Sessums, Their Attorney

OF COUNSEL:

DAVID M. SESSUMS, MSB #6714
VARNER, PARKER & SESSUMS, P.A.
Post Office Box 1237
1110 Jackson Street
Vicksburg, Mississippi 39183
Telephone: 601.638.8741
Facsimile: 601.638.8666

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN

PLAINTIFFS

VS.

NO. 2014-01

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: ISSAQUENA COUNTY, MISSISSIPPI
c/o Richard Jones, Issaquena County Sheriff
129 Court Street
Mayersville, MS 39113

NOTICE TO DEFENDANT(S)

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the following attorney for
the Plaintiff(s): **DAVID M. SESSUMS, ESQUIRE, Varner, Parker & Sessums, P.A., 1110 Jackson
Street, Post Office Box 1237, Vicksburg, Mississippi, 39181, (601) 638-8741.**

Your response must be mailed or hand-delivered within thirty (30) days from the date of delivery
of this Summons and Complaint or a judgment of default will be entered against you for the money or other
things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within a reasonable time
afterwards.

Issued under my hand and seal of this court this the 26 day of March, 2014.



CIRCUIT CLERK OF ISSAQUENA COUNTY,
MISSISSIPPI

BY: Robert D. Jones D.C.

RETURN

STATE OF MISSISSIPPI
COUNTY OF WARREN

() I personally delivered copies of the Summons and Complaint on the ____ day of _____, 2014 to _____.

() After exercising reasonable diligence I was unable to deliver copies of the Summons and Complaint to _____ within _____ County, Mississippi. I served the Summons and Complaint on the ____ day of _____, 20____ at the usual place of abode of said _____, a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the ____ day of _____, 20____ I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

() I was unable to serve the Summons and Complaint.

This the ____ day of _____, 2014.

PROCESS SERVER

SWORN TO AND SUBSCRIBED before me this ____ day of _____, 2014.

NOTARY PUBLIC

My Commission Expires: _____

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN

PLAINTIFFS

VS.

NO. 2014-01

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: ISSAQUENA COUNTY REGIONAL CORRECTIONAL FACILITY
c/o Richard Jones, Issaquena County Sheriff
129 Court Street
Mayersville, MS 39113

NOTICE TO DEFENDANT(S)

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MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the following attorney for
the Plaintiff(s): **DAVID M. SESSUMS, ESQUIRE, Varner, Parker & Sessums, P.A., 1110 Jackson
Street, Post Office Box 1237, Vicksburg, Mississippi, 39181, (601) 638-8741.**

Your response must be mailed or hand-delivered within thirty (30) days from the date of delivery
of this Summons and Complaint or a judgment of default will be entered against you for the money or other
things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within a reasonable time
afterwards.



Issued under my hand and seal of this court this 20th day of March, 2014.

CIRCUIT CLERK OF ISSAQUENA COUNTY,
MISSISSIPPI

BY: Robin Dunbar D.C.

RETURN

STATE OF MISSISSIPPI
COUNTY OF WARREN

() I personally delivered copies of the Summons and Complaint on the ____ day of _____, 2014 to _____.

() After exercising reasonable diligence I was unable to deliver copies of the Summons and Complaint to _____ within _____ County, Mississippi. I served the Summons and Complaint on the ____ day of _____, 20____ at the usual place of abode of said _____, a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the ____ day of _____, 20____ I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

() I was unable to serve the Summons and Complaint.

This the ____ day of _____, 2014.

PROCESS SERVER

SWORN TO AND SUBSCRIBED before me this ____ day of _____, 2014.

NOTARY PUBLIC

My Commission Expires: _____

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN

PLAINTIFFS

VS.

NO. 2014-01

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: ISSAQUENA COUNTY, MISSISSIPPI
c/o Earline Fortner, Issaquena County Circuit Clerk
129 Court Street
Mayersville, MS 39113

NOTICE TO DEFENDANT(S)

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the following attorney for
the Plaintiff(s): **DAVID M. SESSUMS, ESQUIRE, Varner, Parker & Sessums, P.A., 1110 Jackson
Street, Post Office Box 1237, Vicksburg, Mississippi, 39181, (601) 638-8741.**

Your response must be mailed or hand-delivered within thirty (30) days from the date of delivery
of this Summons and Complaint or a judgment of default will be entered against you for the money or other
things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within a reasonable time
afterwards.

Issued under my hand and seal of this court this 26th day of March, 2014.



CIRCUIT CLERK OF ISSAQUENA COUNTY,
MISSISSIPPI

BY: Robbie Dumas D.C.

RETURN

STATE OF MISSISSIPPI
COUNTY OF WARREN

() I personally delivered copies of the Summons and Complaint on the ____ day of _____, 2014 to _____.

() After exercising reasonable diligence I was unable to deliver copies of the Summons and Complaint to _____ within _____ County, Mississippi. I served the Summons and Complaint on the ____ day of _____, 20____ at the usual place of abode of said _____, a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the ____ day of _____, 20____ I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

() I was unable to serve the Summons and Complaint.

This the ____ day of _____, 2014.

PROCESS SERVER

SWORN TO AND SUBSCRIBED before me this ____ day of _____, 2014.

NOTARY PUBLIC
My Commission Expires: _____

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN

PLAINTIFFS

VS.

NO. 2014-01

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: ISSAQUENA COUNTY REGIONAL CORRECTIONAL FACILITY
c/o Earline Fortner, Issaquena County Circuit Clerk
129 Court Street
Mayersville, MS 39113

NOTICE TO DEFENDANT(S)

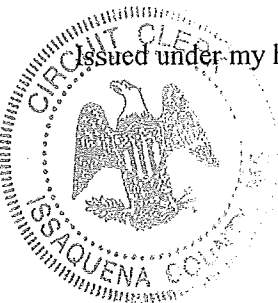
THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU
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You are required to mail or hand-deliver a copy of a written response to the following attorney for
the Plaintiff(s): **DAVID M. SESSUMS, ESQUIRE, Varner, Parker & Sessums, P.A., 1110 Jackson
Street, Post Office Box 1237, Vicksburg, Mississippi, 39181, (601) 638-8741.**

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of this Summons and Complaint or a judgment of default will be entered against you for the money or other
things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within a reasonable time
afterwards.

Issued under my hand and seal of this court this 26th day of March, 2014.



CIRCUIT CLERK OF ISSAQUENA COUNTY,
MISSISSIPPI

BY: Robbi Duncan D.C.

RETURN

STATE OF MISSISSIPPI
COUNTY OF WARREN

() I personally delivered copies of the Summons and Complaint on the ____ day of _____, 2014 to _____.

() After exercising reasonable diligence I was unable to deliver copies of the Summons and Complaint to _____ within _____ County, Mississippi. I served the Summons and Complaint on the ____ day of _____, 20____ at the usual place of abode of said _____, a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the ____ day of _____, 20____ I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

() I was unable to serve the Summons and Complaint.

This the ____ day of _____, 2014.

PROCESS SERVER

SWORN TO AND SUBSCRIBED before me this ____ day of _____, 2014.

NOTARY PUBLIC
My Commission Expires: _____

FEE BILL, CIVIL CASES, CIRCUIT COURT

STATE OF MISSISSIPPI
ISSAQUENA COUNTYCASE NO. 2014-04Angela Jordan et al
VS.
Issaquena County, MSN^o 1107

LAWRENCE-GREENWOOD 20666

Jury Tax	\$ 3.00
Court Reporter's Fee	10.00
Law Library	3.50
State Court Education Fund	2.00
Clerk's Fee	25.00
Sub-Total	43.50
Sheriff's Fee	
Fees of other Sheriff's	
State Comm. or Officers	
Other	
Other <u>Court Costs</u>	<u>160.00</u>
Other	
Other	
Other	
Marriage License (Domestic Violence 14.00 Clerk's Fee 6.00)	
Amount Paid	
Amount Due	

How Paid: ☐ Cash
☒ Check
☐ Money Order

Payment received from Warner Parker & Sessions
 this the 26 day of March D., 20 14 Dollars \$ 160.00

By _____ D. C. Jo Hartman Circuit Clerk

PRESCRIBED BY MISS. STATE DEPT. OF AUDIT

VARNER PARKER & SESSUMS, P.A.
ATTORNEYS AT LAW
A PROFESSIONAL ASSOCIATION

J. MACK VARNER
DAVID M. SESSUMS
R. EUGENE PARKER, JR. - rep@vpslaw.com
CLIFFORD C. WHITNEY III - ccw@vpslaw.com
PENNY B. LAWSON - plawson@vpslaw.com

March 27, 2014

1110 JACKSON STREET
POST OFFICE BOX 1237
VICKSBURG, MS 39181

TELEPHONE (601) 638-8741
FACSIMILE (601) 638-8666
www.vpslaw.com

Ms. Earline Fortner
Issaquena County Circuit Clerk
P.O. Box 27
Mayersville, MS 39113

RE: Angela Jordan et al v. Issaquena County, Mississippi et al
Issaquena County Circuit No.: 2014-01

Dear Ms. Fortner:

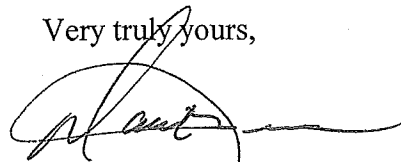
Enclosed herewith please find the following:

1. Original and one (1) copy of Summons/Return served upon Richard Jones, Sheriff of Issaquena County, Mississippi on behalf of Issaquena County Regional Correctional Facility;
2. Original and one (1) copy of Summons/Return served upon Earline Fortner, Chancery Clerk of Issaquena County, Mississippi on behalf of Issaquena County Regional Correctional Facility;
3. Original and one (1) copy of Summons/Return served upon Richard Jones, Sheriff of Issaquena County, Mississippi on behalf of Issaquena County, Mississippi;
4. Original and one (1) copy of Summons/Return served upon Earline Fortner, Chancery Clerk of Issaquena County, Mississippi on behalf of Issaquena County, Mississippi.

Please mark the copies of each Summons "filed" and return same to me in the self addressed stamped envelope enclosed herewith for your convenience.

With best regards, I am,

Very truly yours,



DAVID M. SESSUMS

DMS/ajn
Enclosures

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN

PLAINTIFFS

VS.

NO.

2014-01

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: ISSAQUENA COUNTY, MISSISSIPPI
c/o Richard Jones, Issaquena County Sheriff
129 Court Street
Mayersville, MS 39113

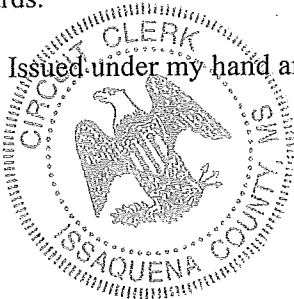
NOTICE TO DEFENDANT(S)

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the following attorney for
the Plaintiff(s): **DAVID M. SESSUMS, ESQUIRE, Varner, Parker & Sessums, P.A., 1110 Jackson
Street, Post Office Box 1237, Vicksburg, Mississippi, 39181, (601) 638-8741.**

Your response must be mailed or hand-delivered within thirty (30) days from the date of delivery
of this Summons and Complaint or a judgment of default will be entered against you for the money or other
things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within a reasonable time
afterwards.



Issued under my hand and seal of this court this 26th day of March, 2014.

CIRCUIT CLERK OF ISSAQUENA COUNTY,
MISSISSIPPI

BY:

Robbi Duncan D.C.

FILED March 31 2014
Coline Fontaine
CLERK

RETURN

STATE OF MISSISSIPPI
COUNTY OF WARREN

(☒) I personally delivered copies of the Summons and Complaint on the 26th day of March, 2014 to Richard Jones


() After exercising reasonable diligence I was unable to deliver copies of the Summons and Complaint to _____ within _____ County, Mississippi. I served the Summons and Complaint on the ____ day of _____, 20____ at the usual place of abode of said _____, a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the ____ day of _____, 20____ I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

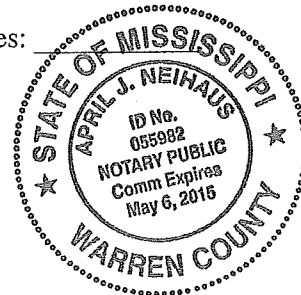
() I was unable to serve the Summons and Complaint.

This the 26th day of March, 2014.


PROCESS SERVER

SWORN TO AND SUBSCRIBED before me this 26 day of March, 2014.


NOTARY PUBLIC
My Commission Expires: _____



IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN

PLAINTIFFS

VS.

NO. 2014-01

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: ISSAQUENA COUNTY, MISSISSIPPI
c/o Earline Fortner, Issaquena County Circuit Clerk
129 Court Street
Mayersville, MS 39113

NOTICE TO DEFENDANT(S)

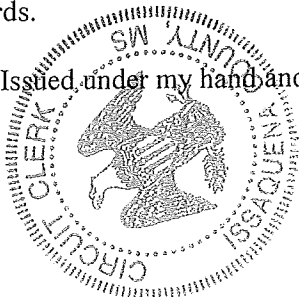
THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the following attorney for
the Plaintiff(s): **DAVID M. SESSUMS, ESQUIRE, Varner, Parker & Sessums, P.A., 1110 Jackson
Street, Post Office Box 1237, Vicksburg, Mississippi, 39181, (601) 638-8741.**

Your response must be mailed or hand-delivered within thirty (30) days from the date of delivery
of this Summons and Complaint or a judgment of default will be entered against you for the money or other
things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within a reasonable time
afterwards.

Issued under my hand and seal of this court this 24th day of March, 2014.



CIRCUIT CLERK OF ISSAQUENA COUNTY,
MISSISSIPPI

BY: Earline Fortner D.C.

FILED March 31 2014
Earline Fortner
CLERK

RETURN

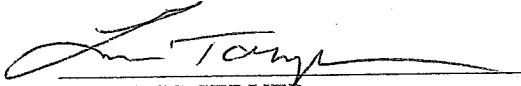
STATE OF MISSISSIPPI
COUNTY OF WARREN

(☒) I personally delivered copies of the Summons and Complaint on the 26th day of March, 2014 to Earline Fortner.

() After exercising reasonable diligence I was unable to deliver copies of the Summons and Complaint to _____ within _____ County, Mississippi. I served the Summons and Complaint on the ____ day of _____, 20____ at the usual place of abode of said _____, a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the ____ day of _____, 20____ I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

() I was unable to serve the Summons and Complaint.

This the 26th day of March, 2014.


PROCESS SERVER

SWORN TO AND SUBSCRIBED before me this 26 day of March, 2014.


NOTARY PUBLIC
My Commission Expires: _____



IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN,

PLAINTIFFS

VS.

NO. 2014-01

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: ISSAQUENA COUNTY REGIONAL CORRECTIONAL FACILITY
c/o Richard Jones, Issaquena County Sheriff
129 Court Street
Mayersville, MS 39113

NOTICE TO DEFENDANT(S)

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU
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You are required to mail or hand-deliver a copy of a written response to the following attorney for
the Plaintiff(s): **DAVID M. SESSUMS, ESQUIRE, Varner, Parker & Sessums, P.A., 1110 Jackson
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of this Summons and Complaint or a judgment of default will be entered against you for the money or other
things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within a reasonable time
afterwards.



Issued under my hand and seal of this court this 21st day of March, 2014.

CIRCUIT CLERK OF ISSAQUENA COUNTY,
MISSISSIPPI

BY: Kebbi Dunbar D.C.

FILED March 31 2014
Delue Porter
CLERK

RETURN

STATE OF MISSISSIPPI
COUNTY OF WARREN

(✓) I personally delivered copies of the Summons and Complaint on the 20th day of March, 2014 to Richard T. -os

() After exercising reasonable diligence I was unable to deliver copies of the Summons and Complaint to _____ within _____ County, Mississippi. I served the Summons and Complaint on the _____ day of _____, 20____ at the usual place of abode of said _____, a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the _____ day of _____, 20____ I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

() I was unable to serve the Summons and Complaint.

This the 20th day of March, 2014.

[Signature]
PROCESS SERVER

SWORN TO AND SUBSCRIBED before me this 20 day of March, 2014.

[Signature]
NOTARY PUBLIC
My Commission Expires: _____



IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN

PLAINTIFFS

VS.

NO. 2014-01

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: ISSAQUENA COUNTY REGIONAL CORRECTIONAL FACILITY
c/o Earline Fortner, Issaquena County Circuit Clerk
129 Court Street
Mayersville, MS 39113

NOTICE TO DEFENDANT(S)

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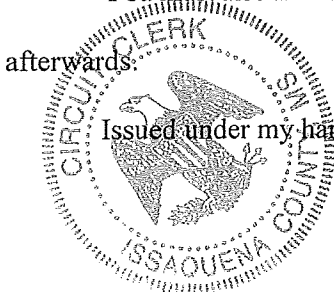
You must also file the original of your response with the clerk of this court within a reasonable time
afterwards.

Issued under my hand and seal of this court this the 26th day of March, 2014.

CIRCUIT CLERK OF ISSAQUENA COUNTY,
MISSISSIPPI

BY: [Signature] D.C.

FILED March 31 2014
[Signature]
CLERK



RETURN

STATE OF MISSISSIPPI
COUNTY OF WARREN

(☒) I personally delivered copies of the Summons and Complaint on the 26th day of March, 2014 to Earline Fortner

() After exercising reasonable diligence I was unable to deliver copies of the Summons and Complaint to _____ within _____ County, Mississippi. I served the Summons and Complaint on the ____ day of _____, 20____ at the usual place of abode of said _____, a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the ____ day of _____, 20____ I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

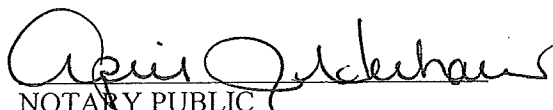
() I was unable to serve the Summons and Complaint.

This the 26th day of March, 2014.


PROCESS SERVER

SWORN TO AND SUBSCRIBED before me this 26th day of March, 2014.




NOTARY PUBLIC
My Commission Expires: _____